

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

In re:

HILAL K. HOMAIDAN fka Helal K. Homaidan
Debtor,

Chapter 7

Case No. 08-48275 (ESS)

In re:

REEHAM YOUSSEF aka Reeham Navarro Youssef aka
Reeham N. Youssef
Debtor,

Chapter 7

Case No. 13-46495 (ESS)

HILAL K. HOMAIDAN and REEHAM YOUSSEF on
behalf of themselves and all others similarly situated

Plaintiffs,

Adv. Pro. No. 17-1085 (ESS)

v.

SALLIE MAE, INC, NAVIENT SOLUTIONS, LLC,
NAVIENT CREDIT FINANCE CORPORATION

Defendants.

**AMENDED NOTICE OF UNOPPOSED MOTION
TO AMEND THE COMPLAINT AND SEVER A PARTY**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Adam R. Shaw and the exhibits annexed thereto, Hilal K. Homaidan and Reeham Youssef, by their attorneys of record will move before the Hon. Elizabeth S. Stong, United States Bankruptcy Judge, at the United States Bankruptcy Court, 271-C Cadman Plaza East, Suite 1595 Brooklyn, NY 11201-1800 on the 28th day of July, 2023 at 12:00 P.M. or as soon thereafter as counsel can be heard, for an Order (i) amending the Complaint to add claims for violation of the Fair Debt Collection Practices Act and (ii) to sever plaintiff Hilal K. Homaidan from the Amended Complaint.

PLEASE TAKE FURTHER NOTICE, that the objections, if any, to the Motion shall (i) be in writing, (ii) set forth the factual and legal basis for the objection, (iii) identify the party raising the objection, (iv) comply with the Federal Rules of Bankruptcy procedure, (v) be filed with this Court (with one (1) copy to Chambers), and (vi) be served on all parties so as to be filed and received no later than required by the Local Rules prior to the hearing date.

Dated: July 21, 2023

Respectfully submitted,

By: /s/ Adam R. Shaw
Adam R. Shaw
George F. Carpinello
Jenna C. Smith
BOIES SCHILLER FLEXNER LLP
30 South Pearl Street, 11th Floor
Albany, NY 12207
(518) 434-0677
ashaw@bsflp.com
gcarpinello@bsflp.com
jsmith@bsflp.com

Jason W. Burge
FISHMAN HAYGOOD LLP
201 St. Charles, Suite 4600
New Orleans, LA 70170
(504) 596-5252
jburge@fishmanhaygood.com

Lynn E. Swanson
JONES SWANSON HUDDELL LLC
601 Poydras Street, Suite 2655
New Orleans, LA 70130
(504) 523-2500
lswanson@jonesswanson.com

*Counsel for Plaintiff Reeham Youssef and the
Putative Class*

CERTIFICATE OF SERVICE

I, Adam R. Shaw, hereby certify that on July 21, 2023, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to receive such notice. I further certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed July 21, 2023, at Albany, New York.

/s/ Adam R. Shaw

Adam R. Shaw